

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BRITE SMART CORP.,)	
)	
Plaintiff,)	
)	
v.)	Civ. Action No. 2:14-cv-00760-JRG-RSP
)	
GOOGLE INC.)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	
)	
)	

**JOINT MOTION REGARDING BRITE SMART'S
REQUEST FOR PRODUCTION NO. 166**

In this Court's July 1, 2015 Order (Dkt. 140), the Court ordered the Plaintiff Brite Smart and Defendant Google Inc. (the "Parties") to meet and confer and to designate three (3) prior litigation proceedings (the "Designated Proceedings") as responsive to Brite Smart's Request for Production No. 166. Google was ordered to produce (i) the deposition transcripts of the damages experts; (ii) the expert reports of the damages experts; and (iii) the trial testimony transcripts of the damages experts from the Designated Proceedings.

On July 3, 2015, Brite Smart identified the following Designated Proceedings:

1. *Function Media, L.L.C. v. Google, Inc. and Yahoo!, Inc.*, Eastern District of Texas, Case No. 2:2007cv00279
2. *I/P Engine, Inc. v. AOL, Inc., Google, Inc., IAC Search & Media, Inc., Gannett Company, Inc., and Target Corp.*, Eastern District of Virginia, Case No. 2:11-cv-512

3. *Bright Response LLC v. Google Inc.*, Eastern District of Texas, Case No. 2:07-cv-00371

Google shall produce the documents no later than July 27, 2015 except for and subject to any objections by third parties to whom Google is required to provide notice of disclosure in advance of production.

DATED: July 6, 2015

/s/ Robert Katz

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 6, 2015.

/s/ Robert Katz

Robert Katz